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bcc

Subject Review comments re: 3rd West Substation cleanup SOW

David. Attached is your original SOW, annotated with our review comments. Any questions, please call.

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UPL - 3rd West Substation Draft WP.v

Exhibit A

Scope of Work

(Note:

Site work will not commence until an appropriate Administrative Order on Consent (AOC), between the Environmental Protection Agency (EPA) and Utah Power and Light/PacifiCorp has been concluded.

Appropriately trained and equipped Federal and/or state representatives will provide governmental oversight of cleanup activities until final clearance samples are collected and analyzed. Those representatives are to perform such tasks as perimeter and personnel breathing air monitoring as well as clearance sample(s) collection, analysis, and reporting. Accordingly, arrangements should be made for official representatives to have complete site access, including exclusion zones, decon facilities, and the waste-PPE disposal stream, for the duration of the project.)

I. Introduction

A. This Scope of Work describes Contractor's responsibilities in the clean-up and disposal of asbestos-containing dust from the control house at Company's 3rd West Substation, located at 333 West 100 South, Salt Lake City, Utah

II. General Requirements

A. Company shall ensure one of its employees trained in electrical hazards associated with energized substations is on site as a safety watch at all times that Contractor's employees are inside the substation fence.

(Provide copy of the HASP for review.)

1. Contractor's employees shall obey the safety watch on all issues concerning electrical safety.

B. Contractor shall take appropriate steps to safeguard existing items which are scheduled to remain in the facility. These items may include flooring, electrical panels, equipment such as burglar and fire alarms, sensors, speakers, clocks, mechanical grilles, furnaces, light fixtures, conduits, etc.

(Who will provide lock-out/tag-out? May want to consider round-the-clock security of the entire job site until after final clearance. Such security could

not only provide site protection but also monitor/maintain equipment unique to the cleanup (ie, air blowers, filters, etc.)

C. Contractor shall install and maintain at Contractor's expense a job telephone. Telephone shall be located inside the control house and shall be operational prior to commencement of clean-up activities. Contractor shall be fully responsible for all charges to this telephone.

(Telephone should be in the clean zone - may want to consider radios for communicating into/out of the exclusion zone.)

D. Contractor shall provide sufficient chemical toilets on the job site for Contractor's personnel, the Industrial Hygiene Consultant and any authorized visitors. Contractor shall ensure these toilets are maintained appropriately and in a hygienic manner.

E. Contractor shall provide all water necessary for completion of work described in this Scope of Work.

(Does this include proper filtration/disposal of contaminated or gray water?)

F. Contractor shall supply all equipment necessary to produce and use controlled low pressure compressed air for cleaning surfaces of energized electrical equipment.

(Who supplies equipment necessary for other airflow-management activities (ie, space encapsulation, negative air, etc.).)

G. Contractor shall provide an English-speaking interpreter on-site any time Contractor personnel are non-English-speaking.

III. Laws and Regulations

A. Contractor shall determine the extent of city, county, AQMD, state, federal and all other applicable laws and regulations.

B. Contractor shall perform the work in compliance with the most stringent regulations in effect for the work site.

IV. Notifications and Fees

A. Contractor shall properly complete and submit all notifications required for performing the work and pay all required fees.

(A waiver of some governmental fees may be appropriate when activities are conducted pursuant to an AOC.)

V. Training and Certifications

A. In the performance of the work covered by this Scope of Work, Contractor shall employ only workers possessing current certification indicating successful completion of asbestos worker or asbestos supervisor training as described in 40 CFR 763.

(Federal personnel receive training pursuant to 29 CFR 1910.120. Although not mandatory, training as described in 40 CFR 763 is preferred, additional

training. Training as described in 1910.1200 and 1910.134 is included in the 1910.120 40-hour training program.)

B. Contractor shall employ only workers who have received training in Hazard Communication in accordance with 29 CFR 1910.1200.

C. Contractor shall employ only workers who have received training in Respiratory Protection in accordance with 29 CFR 1910.134.

D. Contractor shall, prior to commencement of work, produce, and have available on site for all Contractor-employed workers, training certifications, training records and respirator fit test records.

(As required by OSHA.)

1. Contractor shall keep these certifications and records available on demand at the work site for the duration of this project.

(As required by OSHA.)

VI. Personal Protective Equipment (PPE)

A. Contractor shall provide PPE for all its workers, consisting of Tyvek, or equivalent, over-suits, booties, and hoods; gloves impervious to asbestos fibers; hard hats; safety glasses; steel-toed shoes; and dual P-100 filter half-mask air-purifying respirators (or better).

B. PPE, as described in IV.A., above, shall be worn by Contractor's workers at all times while inside the control house, until work described in this Scope of Work is complete.

(All personnel should wear an appropriate PPE ensemble while in the exclusion zone until the air in the exclusion zone is deemed clear.)

C. Contractor shall establish a clean area immediately outside the control house for donning PPE.

(Building ingress and egress should be via an enclosed pathway (ie, decon trailer) equipped to support proper personnel decontamination and air flow management.)

D. Contractor shall establish an appropriately protected area immediately outside the control house for doffing PPE.

1. This area shall be established such that contamination from inside the control house and/or contamination from PPE is not transferred to unprotected areas outside the control house.

VII. Clean-up

A. Contractor shall establish negative pressure ventilation with HEPA (high efficiency particulate air) filtration in the building.

B. Contractor shall remove all settled dust and associated debris from both the upstairs and downstairs portions of the control house building using compressed air, vacuuming and/or wet wiping for all surfaces.

(Use of compressed air may result in undesired cross-contamination unless the area has been thoroughly vacuumed and wiped first. (Note: Negative air compressors (for flow-control in work-space(s) and the personnel decontamination station) should run continuously.) A suggested way of performing the cleaning is to:

Perform gross decontamination of the top floor. Create containment behind the switchboard which is large enough for a person to work inside. Connect the containment to a negative air system - sufficient in size to allow for frequent air changes. Then use compressed air to clean the switchboard. Conduct air clearance after the switchboards are cleaned. Repeat the cycle until the clearance samples provide ND returns. Once the switchboards are cleaned, and before containment is removed, clean and clear the remainder of the top floor. Following clearance of the entire area, the top floor can be sealed and cleaning/clearing of the bottom floor can begin.)

C. Contractor shall wet-clean all surfaces other than those containing or immediately adjacent to electrical equipment.

1. Contractor acknowledges that the control house contains electric panels and other energized electrical equipment and components which pose potential hazards and agrees to use controlled low pressure compressed air to clean debris and dust from these surfaces.

(Is there a way to lock-out/tag-out the electrical hazards?)

2. Contractor shall exercise all due care and caution to avoid electrical hazards during his work.

D. All material, components, equipment, supplies, and shelving in the basement shall be HEPA vacuumed and/or wet-wiped to clean all dust and debris from exterior surfaces.

(Recommend bagging and disposing of all 'non-value' items first, then clean and seal the 'value' items. (It's usually easier to discard and replace (as opposed to cleaning) unfinished wood shelving.)

1. This cleaned material shall then be removed from the control house and placed in or on Company-provided trucks or trailers.

2. Company representatives shall be on site to determine proper disposition of cleaned material removed from the control house basement.

3. Only concrete and conduit (permanently-installed items) shall remain in the control house basement at the conclusion of Contractor's work.

E. Removed asbestos-containing material (dust and debris) shall be cleaned up and bagged on a continual basis.

1. Removed material shall be containerized, appropriately labeled and secured at the end of each work day.

2. Contractor shall use a waste container that can be made secure from unauthorized disposal, so no extraneous waste is included with the waste generated by Contractor.

VIII. Personnel Monitoring

A. Contractor shall conduct asbestos personnel breathing-zone air monitoring each day of the work.

(The Government will provide perimeter and personnel air monitoring and analysis. The analytical results will be available within 48 hours of C.O.B. of the sample date. Analysis will be TEM (AHERA).)

1. Contractor shall post (in writing) all personnel air sampling results at the job site no later than the end of the following work day.

(OSHA (29 CFR 1910.1101) requires PCM with results posted within 15 days.)

IX. Transport and Disposal of Waste

A. Contractor shall transport all waste in leak-tight containers, in poly-lined, enclosed vehicles.

1. Contractor shall ensure vehicles transporting waste are be appropriately marked.

2. Contractor shall ensure vehicles transporting waste carry all required shipping papers and that these shipping papers are completely and appropriately filled out.

B. Contractor shall transport all waste generated during the performance of work described in this scope of work to a landfill permitted to accept the type of waste generated.

1. Contractor shall complete all paperwork and pay all fees associated with the disposal of this waste.

X. Completion of Work

A. Clean-up work shall be considered complete when both the upstairs and basement areas successfully pass aggressive air monitoring clearance tests following the clean-up activities described in VII Clean-up, above.

1. Aggressive air monitoring clearance tests shall be performed in accordance with 40 CFR 763 Appendix A.

(40 CFR 763 Appendix A relates to school buildings. Clearance criteria applicable here will be that established for Libby Amphibole- (LA-)related activities in Libby, MT. Accordingly, the exclusion area will be deemed clean when zero (0) LA fibers are detected in all air clearance samples when analyzed by TEM (ISO 103120.)

2. The upstairs area and the basement area of the control house shall be considered separate airspaces.

3. Five (5) individual air samples shall be taken from each separate air space.

4. Areas shall be considered clean when the average of the five (5) aggressive air samples taken from the corresponding airspace is no greater than 70 structures per mm².

B. The work covered by this Scope of Work shall be considered complete when air monitoring described in X. Completion of Work A., above, has been successfully completed; all materials, tools, and equipment brought on site by Contractor have been removed from the site; and all waste generated in the performance of this work has been removed from the site.